

EXHIBIT 2

PASSENGER SEXUAL ASSAULT LITIGATION

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1 from Peiffer Wolf for the plaintiffs.

2 **MR. CUBBERLY:** Good morning, Your Honor. Walt

3 Cubberly for the JCCP plaintiff.

4 **MS. CUTTER:** Celine Cutter --

5 **MS. WILKINS:** Good afternoon, Your Honor.

6 Beth Wilkins from Chaffin Luhana for the plaintiffs.

7 **MS. CUTTER:** Celine Cutter, JCCP plaintiffs.

8 **MR. SHORTNACY:** Good afternoon, Your Honor. I am

9 assuming that's everyone for plaintiffs.

10 This is Michael Shortnacy speaking of Shook Hardy & Bacon

11 for the Uber defendants. I have with me today my colleague

12 Patrick Oot, also of Shook Hardy, and my colleagues from Paul

13 Weiss, Randall Luskey and Jacqueline Rubin, who may address

14 the Court today.

15 **THE COURT:** So the first --

16 **THE CLERK:** Your Honor, your mic was out in the

17 beginning of you speaking. I apologize for interrupting.

18 **THE COURT:** That's okay.

19 Good afternoon, everyone. Hopefully, you can hear me now.

20 Thanks for being here.

21 We've got -- it's been a while since we've had any kind of

22 status conference or to talk about where we're at overall with

23 discovery.

24 So I received your joint status report, and I know in

25 addition to that, you've also filed competing positions on

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1 Now, I am ready to hear arguments on the safety data

2 issues that were briefed. So that, I would want to hear today.

3 And as far as some of the other issues that were surfaced

4 in the joint status report, such as the non-custodial sources

5 for documents, policy documents and, like, the knowledge base

6 system that Uber has, we can talk about -- we can talk about

7 that today. It's not formally briefed, but maybe we can

8 resolve any disputes based on anything that's argued today.

9 But -- so just to be clear, what we'll do on June 21st is

10 hear arguments on the third-party subpoenas, hear arguments on

11 custodians and search terms, any arguments on the deposition

12 protocols at that point in time.

13 Today we'll deal with the safety data and any particular

14 issues that were surfaced in the discovery status report.

15 That's my proposal for what we do.

16 **MR. SHORTNACY:** Your Honor, Michael Shortnacy speaking

17 for the Uber defendants.

18 If I could just make a proposal.

19 **THE COURT:** Yes.

20 **MR. SHORTNACY:** The notice for today's proceedings was

21 the status conference, and so I know that the statistics and

22 data PTO 8 motion have been submitted.

23 We would -- we would respectfully request that that be

24 noticed for hearing. And it may be that that hearing take

25 place at the Court's convenience on June 21. It may be that it

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1 deposition protocols.

2 There's a pending dispute related to the safety data that

3 was requested by plaintiffs, and there's a number of letter

4 briefs related to third-party subpoenas and also a letter brief

5 related -- regarding custodians and search terms.

6 So, much of this was filed on Friday according to

7 schedule. So I'm not prepared to hear argument on all of this,

8 but I thought what I could do is basically plan out when I'll

9 hear arguments.

10 And we've already got a June 21st hearing date set for the

11 third-party subpoena issues. So for -- I think that's a time

12 that we can also use to hear argument on any outstanding

13 discovery disputes where there's briefing already pending at

14 this point in time.

15 So as far as the deposition protocols, I was hesitant to

16 make a decision on that today, in part because it's hard -- my

17 own inclination was it's difficult to decide how many

18 depositions should be held when it's not even clear how many

19 custodians we have. And I didn't have a sense that there was a

20 strong urgency -- but tell me if you disagree -- to decide that

21 right away, early this month.

22 But what I first wanted to do was to resolve the

23 custodians and search terms issues, hear argument on that on

24 June 21st, and we can talk about the deposition protocols at

25 that point in time as well.

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1 could happen sooner. But I think the issue is it was not

2 noticed for hearing today. And so we are certainly prepared to

3 talk with the Court about those issues, but in terms of a

4 formal PTO 8 argument, we would respectfully propose that be

5 noticed.

6 **MS. LUHANA:** And, Judge, this is Roopal Luhana.

7 I would just note, in our June 4th joint status report, we

8 specifically had said the parties would be prepared to discuss

9 that PTO 8 dispute. And the plaintiffs are ready, if you'd

10 like to proceed.

11 **MR. SHORTNACY:** And I would just say, that was in

12 plaintiffs' position statement in the case management

13 conference, Your Honor.

14 And so, again, we're happy to talk about it with

15 Your Honor; but I think in terms of a formal motion, that we

16 believe that should be noticed to be heard.

17 **THE COURT:** Well, I'm inclined to set it for hearing

18 on June 13th at 9:00 in the morning by Zoom. So you have a few

19 days to prepare to argue it. But that was briefed ahead of

20 some of the other issues that were filed on the 7th. So I'm

21 just further along and ready to hear the argument on it and

22 decide it.

23 So unless plaintiffs object, I'll set it for 9:00 in the

24 morning via Zoom on June 13th.

25 **MS. LUHANA:** Judge, we don't object to that.

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1 **MR. SHORTNACY:** And we appreciate that, Your Honor.

2 And I think just in terms of process for PTO 8, we expect

3 the search terms and custodians dispute may not be the first or

4 the last dispute that Your Honor hears.

5 And so just, you know, so that the parties are aligned in

6 how those will become teed up, it may be helpful for the Court

7 to set dates, just so that there's no confusion.

8 And so we appreciate Your Honor setting that for hearing.

9 **THE COURT:** Okay.

10 **THE CLERK:** Your Honor --

11 **THE COURT:** Well --

12 **THE CLERK:** -- just to -- oh, I apologize, Your Honor.

13 Just to confirm, you're setting a status conference for

14 June 13th at 9:00 a.m.

15 **THE COURT:** It's a hearing on the parties' discovery

16 dispute related to safety data. It's filed at ECF 592.

17 **THE CLERK:** Thank you, Your Honor.

18 **THE COURT:** And the parties have briefed up the letter

19 brief -- their letter brief regarding custodians and search

20 terms at 607. That's the ECF number on the docket.

21 So I was inclined to put that over to the 21st, but since

22 we're meeting anyways on the 13th, let's do the argument then,

23 that morning at 9:00.

24 **MR. SHORTNACY:** We understand, Your Honor.

25 **THE COURT:** Okay.

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1 And so the ones that they produced to us were just general

2 things like the DFS submissions, the Bliss database,

3 Google Drive, documents produced pursuant to PTO 5 and

4 PureCloud.

5 And as you raised, we would believe that Uber has

6 maintained, through the course of time, certain documents that

7 are centrally located. However, their position has been that

8 we're going to get those documents via custodial searches and

9 piecemeal.

10 But, obviously, there are non-custodial sources which were

11 stored that shouldn't require search terms to produce, like the

12 knowledge base policies; for example, any kind of retention

13 policies. And one of the other things that we had raised was,

14 for example, the safety report data, which obviously is going

15 to be discussed on June 13th.

16 But -- so we're at a loss here in terms of how they

17 maintain their non-custodial files, and we would think there

18 would be a lot more than they represented to us. And so some

19 clarity from, I believe, Mr. Shortnacy would be helpful.

20 **MR. SHORTNACY:** Yeah, Your Honor, I'll address that.

21 We have -- Uber has met its deadlines with respect to the

22 milestones. It has explained the non-data source -- the

23 non-custodial data sources from which it will collect

24 documents.

25 What we are presented with in the meet and confer process

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1 **MR. SHORTNACY:** We appreciate that.

2 **THE COURT:** So that's notice -- that letter brief is

3 notice for a hearing as well, and that's the letter brief

4 that's filed at ECF 607.

5 Okay. So as far as the discovery status report, then, you

6 explained what's going on with custodians, search terms. There

7 was an issue around the non-custodial sources for documents

8 like policies. And so that's not teed up in a discovery

9 letter, but maybe we can avoid that by talking about it right

10 now.

11 I mean, is there no centralized repository for Uber's

12 policy documents? Or maybe that's shifted over the years,

13 since we're talking about a large time period. But perhaps

14 this is pretty straightforward and we might be able to come to

15 a solution today.

16 **MS. LUHANA:** Judge, Roopal Luhana for the plaintiffs.

17 As you're aware, you entered the ESI order and required

18 the parties to meet and confer regarding custodial and

19 non-custodial sources.

20 And in terms of the discovery that plaintiffs had served

21 RFPs to defendants on February 28th, we had also negotiated

22 additional milestones. And one of the milestones that we had

23 negotiated to allow defendants to have a three-month extension

24 for discovery was them -- for them to produce a list of

25 non-custodial sources.

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1 is a series of questions that I think that we have tried to

2 address in the meet and confer process. The specific question

3 that Your Honor has raised as to what I -- you know, it's

4 referred to by plaintiffs as a central data source. We have

5 investigated that.

6 We have also proposed providing plaintiffs with specific

7 policies that are at issue, because the reason that this

8 system, to the extent it exists, was even raised is because one

9 of the plaintiffs' counsel in another case, in an employment

10 case, unrelated to these proceedings, apparently at some former

11 point in time had learned about a system through that

12 proceeding. We are looking into that system and seeing whether

13 there are non-duplicative documents that would need to be

14 produced.

15 But our approach for the policies and procedures,

16 Your Honor, just to be very clear, is that we have pulled

17 specific policies in place for relevant areas of inquiry that

18 the plaintiffs have raised in their requests for production,

19 like the policy for reactivation or deactivation of independent

20 drivers, for example. There are discrete policies that are at

21 issue or that may have changed over time that Uber is pulling

22 together to produce pursuant to its responses and objections.

23 And so we are in the process of meeting and conferring with

24 plaintiffs about that.

25 I think what plaintiffs specifically are seeking is the

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1 production of that entire system or database or an index, to
2 the extent it exists -- and I don't believe it does -- to be
3 able to then choose and select policies that plaintiffs believe
4 may be responsive to their requests.
5 Our position is, as we've stated to plaintiffs in the meet
6 and confer process, that's backwards; it's disproportionate and
7 not necessary because Uber will pull specific policies that are
8 relevant and produce them. I don't think there's any objection
9 to that.
10 But I think that the issue here -- and there really
11 shouldn't be a dispute -- is whether an entire system should be
12 subject to production or an entire list for every policy in the
13 company, to the extent it exists, should be produced. And our
14 position is that's unnecessary and disproportionate.
15 **THE COURT:** Is there an index or a table of contents
16 or something of that sort?
17 **MR. SHORTNACY:** I'm not aware of that in that system,
18 and nor am I aware --
19 **THE COURT:** Or any other system? Is there a list of
20 policies that Uber management or executives looks to?
21 **MR. SHORTNACY:** I think the policies and procedures
22 reside in multiple parts of the company and the systems. And
23 remember, this company has gone through iterations --
24 **THE COURT:** Right.
25 **MR. SHORTNACY:** -- over time; and so all of these

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1 But what Uber is doing in terms of its factual
2 investigation in response to plaintiffs' request is to look in
3 the appropriate places that correlate to policies and
4 procedures that are called for in requests for production by
5 plaintiffs.
6 And an easy example would be rider or -- driver or
7 rider -- independent driver, that is -- deactivation or
8 reactivation. Those would be in a centralized place. Uber
9 would pull those documents, to the extent they exist, over the
10 appropriate period of time and produce them.
11 And so what we're doing is looking in the right places,
12 fractured though they may be, to be able to pull policies and
13 procedures for plaintiffs in response to their requests.
14 We have different teams and different entities all over
15 the world that house this data. So we're undertaking that
16 effort to find the appropriate policies, and there's no central
17 place to look.
18 **MS. LUHANA:** Judge, this is Roopal Luhana.
19 Unfortunately, the milestone we had negotiated with the
20 defendants was May 6, and, of course, the ESI protocol was
21 entered way before that. And so for the defendants to say just
22 Team Google Drives is a non-custodial source, frankly, isn't
23 sufficient.
24 And in terms of the knowledge base that we had raised
25 where they had kept their policies, we had provided an index of

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1 things have changed, the systems have changed.
2 **THE COURT:** Right. But is there a centralized
3 web page that one would go to to find the bulk of this
4 information?
5 **MR. SHORTNACY:** No, Your Honor, there is not.
6 **THE COURT:** Or a set -- you know, or maybe a set of
7 pages, like HR, or dealing with drivers, or -- maybe it's not
8 one omnibus place that all of the policies live, but a set of
9 places where there may be lists.
10 **MR. SHORTNACY:** That's -- that's correct, Your Honor.
11 Your understanding is correct. There is not a centralized
12 list.
13 **THE COURT:** Is it, like, five different places?
14 Because -- I'm asking these questions because you have argued
15 proportionality, and so I'm trying to understand --
16 **MR. SHORTNACY:** Well --
17 **THE COURT:** -- how many different places these
18 documents might be -- might live in and be organized in.
19 **MR. SHORTNACY:** Certainly, Your Honor. Let me address
20 that point.
21 I think the argument here, before we get into our
22 proportionality analysis per se, is that the procedures that
23 plaintiffs are seeking do not reside in a centralized place.
24 They may be fractured and all over the place, and I do not know
25 how many specific places they may be.

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1 sorts to them that we had, and we still haven't heard back from
2 defendants on these non-custodial sources.
3 And we just find it hard to believe that there wasn't
4 centralized folders, for example, in Google Drive for the
5 safety team, for the marketing team. They must have housed
6 documents in a centralized place, but we've been unable to get
7 answers beyond the Team Google Drives, to have Bliss as
8 non-custodial sources, PureCloud as non-custodial sources, and
9 not get answers.
10 And right now it's June 11th, and this was something that
11 was negotiated and was supposed to be produced by May 6th.
12 **MR. SHORTNACY:** Your Honor, I disagree with counsel's
13 representations. I mean, we have been engaged in the process
14 of information sharing. We have provided information about the
15 places we're going to look. We've litigated the issue of the
16 Google Drive documents. And so I'm just -- I'm not sure how to
17 respond to counsel's representation other than to say that we
18 have provided information.
19 **THE COURT:** I -- what I'm hearing on the part of
20 defendants is that you want plaintiffs to ask for relevant
21 evidence or documents or policies in a particular manner, that
22 is, to sort of like ask for the policy and then you go find
23 that particular policy and pull it from one of these central --
24 one of several somewhat centralized locations where the
25 policies may live at any particular time.

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1 Plaintiffs are asking for what appears to me to be
2 relevant policy information and information about -- and they
3 don't necessarily know what the names of all the different
4 policies are because they don't work for Uber. So this is
5 their approach to searching down -- searching for relevant
6 documents. I don't know -- I don't think that -- it's not an
7 approach that you -- that Uber prefers or the defendants
8 prefer, but I don't think that there is an aspect of Rule 26
9 that precludes them from asking for this information in this
10 way unless it's disproportionate.

11 And from what you've described so far, the fact that it's
12 not in one omnibus location doesn't -- and that it may live in
13 a couple of different places doesn't mean that it is
14 disproportionate for them to ask for a table of contents or an
15 index, indices or, you know, printouts of the web pages that
16 describe all the different policies, and then they can get a
17 sense of what the universe of policy documents are that relate
18 to the claims here in this case.

19 So to me it sounds like you're arguing that the way that
20 plaintiffs are going about searching for the relevant evidence
21 is what Uber finds objectionable; but unless it's
22 disproportionate or unduly burdensome, to me it doesn't strike
23 me as out of bounds as far as Rule 26 is concerned.

24 **MR. SHORTNACY:** But, Your Honor, let me just take one
25 additional swing at this one, if I could.

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1 to the extent that they reside by custodians that are in roles
2 who would touch policies and procedures.

3 So I think there is a relevance portion to the argument,
4 and, hopefully, that addresses Your Honor's first question, the
5 proportionality question, which if we would be permitted to
6 provide, you know, some substantiation to that, if it would be
7 helpful to Your Honor, there's really -- that's the second
8 piece of the analysis.

9 I think the first piece, we're providing. The second
10 piece would be the burden to going to the disparate places
11 within the company, to the extent these things exist.

12 **MS. LUHANA:** Judge --

13 **THE CLERK:** Your Honor, my apologies for interrupting.

14 I have a Bret Stanley that is consistently raising his
15 hand. Is he with either plaintiff or defense side --

16 **MS. LUHANA:** He is with the plaintiffs.

17 **THE CLERK:** -- and should be heard?

18 **MS. LUHANA:** Yes. Yes, he should be heard.

19 **THE CLERK:** Okay.

20 **MS. LUHANA:** Mr. Stanley actually knows a great deal
21 about the knowledge base database. And that's the database
22 that has -- provides Uber support staff with policies,
23 instructional articles, that assists the Uber staff in managing
24 rider and driver issues. So it's a critical database, and
25 we've asked about it numerous times to the defendants and

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1 The issue is that the documents, to the extent they exist,
2 reside in disparate places.

3 And what plaintiffs are saying is: We want all policies
4 and procedures.

5 And what Uber is saying is: We will respond and provide
6 appropriate responsive policies and procedures that relate to
7 the areas and categories of the case that are relevant and that
8 we can put our hands on and provide to plaintiffs.

9 And those policies and procedures, categorically speaking,
10 can relate to the requests for production and the claims and
11 defenses of the cases, which Rule 26 requires. Uber is in the
12 process of doing that. And what we're saying is that we are
13 producing those documents. And I think in some respects, this
14 is a premature dispute because we're providing those policies
15 and procedures in the relevant categories, which we've
16 identified to plaintiffs.

17 Going to every disparate place where an index -- an,
18 a-n -- an index may reside, I think, is burdensome, and there's
19 no reason that I think that I've heard articulated by
20 plaintiffs that the search that Uber is doing presently is
21 somehow inadequate.

22 The plaintiffs are getting policies and procedures that
23 are relevant to the case, and they will get them. And they
24 will get them through non-custodial sources, and they're very
25 likely to get them in custodial searches through search terms,

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1 haven't heard anything since.

2 And then there are other non-custodial files which, as I
3 articulated, presumably would be located centrally as well, but
4 those haven't been provided.

5 And I presume there would be some level of index somewhere
6 that Uber has as to these policies or as to these shared
7 folders that are maintained in the centralized location. And
8 specifically in the ESI order, Judge, you had noted that Uber
9 was supposed to provide the specific location of these
10 non-custodial files as well, and we will simply haven't
11 received that.

12 **THE CLERK:** Your Honor.
(Bret Stanley joins the proceedings via Zoom.)

14 **THE CLERK:** Mr. Stanley, can you please state your
15 appearance, since you're coming on after we've already called
16 the case?

17 **MR. STANLEY:** Good afternoon. Bret Stanley on behalf
18 of the plaintiffs. Thank you very much.

19 **THE CLERK:** Thank you.

20 **THE COURT:** Okay. Is there a -- Mr. Shortnacy, is
21 there a knowledge base -- set of knowledge base policies in an
22 internal database? Is there a knowledge base system? Is that
23 a -- are you disputing that that exists?

24 **MR. SHORTNACY:** We're not disputing that, Your Honor.
25 We are saying that that exists, and it's being searched for

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1 relevant policies. And those policies, as I explained, differ
2 over time and can be categorized in different ways, depending
3 on the subject matter that, as counsel, we are working with
4 Uber to correlate back to the request for production.
5 **THE COURT:** Okay.
6 **MR. STANLEY:** Judge, could I give some color to this,
7 please?
8 **THE COURT:** Sure.
9 **MR. STANLEY:** I apologize for not having a tie on. I
10 didn't know that this was going to be a front issue today.
11 I'm Bret Stanley on behalf of the plaintiffs. It's good
12 to see you.
13 So the knowledge base platform is a platform that holds
14 hundreds and hundreds of policies that dictate what support
15 staff do with riders and drivers on a daily basis. If there's
16 a rider that calls in or a driver that calls in, the knowledge
17 base platform exists so that support staff can find the policy
18 to decide how to respond.
19 And so I have received many of these policies through
20 employment litigation against Uber over the past several years,
21 and I provided hundreds of these policies to defense counsel in
22 hopes that we can get them just to be turned over and sent to
23 us. It's relevant to the employment question, but it's also
24 relevant to how Uber deals with both riders and drivers.
25 And so we know that the knowledge base platform houses

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1 and, on the other hand, go to other places that those indices
2 would reside.
3 And when we're talking about the specific and narrow ask
4 for knowledge base, I think there should be, as I mentioned
5 before, really no dispute. Uber is undertaking an effort to
6 search that to produce relevant responses that correlate to the
7 categories the plaintiffs have asked.
8 **THE COURT:** Understanding the sort of categories or
9 taxonomy of policies within -- within the knowledge base
10 system, to me it would seem relevant to understanding how Uber
11 is managing its drivers and dealing with reports that customers
12 are making to the company.
13 So, you know, it does seem like the relevance is there
14 with respect to the policies. And what is relevant is not only
15 discrete policies within that system that may bear on the
16 claims, but also how the policies are organized in relation to
17 managing the drivers' work and sort of what -- what the
18 different issues are that Uber has to contend with in terms of
19 interfacing with its drivers and managing them.
20 So I don't -- I don't -- I think that there is some
21 relevance there, and this is one system that plaintiffs are
22 asking out -- asking about specifically. So it doesn't seem
23 disproportionate or burdensome to produce the table of contents
24 or the index or a printout of the web page at different points
25 of times.

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1 many versions of these policies. I've taken 30(b)(6)
2 depositions against Uber witnesses talking about these
3 policies, discussing them and other issues. And so they're
4 there, and they're designed for ease of use by support staff,
5 and they're in a centralized location.
6 Once they developed the knowledge base platform, it was
7 designed for ease of use and for all the policies to be housed
8 in one location. And so I don't understand the various
9 locations that counsel is discussing. It's all housed in one
10 place. I don't understand that.
11 **MR. SHORTNACY:** Your Honor, if I could address that.
12 It's Michael Shortnacy speaking.
13 I mean, I think what Mr. Stanley said is not correct.
14 "It's all housed in one place" is just simply not correct.
15 And we're not disputing that knowledge base is a system.
16 We've explained that to plaintiffs. We're searching it. We
17 will produce documents relating to policies for support staff,
18 as Mr. Stanley has requested. We're not arguing about that.
19 The issue is, what plaintiffs are seeking and the way that
20 they've -- Ms. Luhana has framed the issue for the Court is
21 they want -- they want indices that may or may not exist for
22 all systems besides the one that we're talking about here. And
23 so that is where the burden truly comes in.
24 I mean, they're, in a sense, asking us to create -- on the
25 one hand, potentially create indices that may or may not exist

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1 It may -- I'm sure that this -- what exactly is contained
2 therein and the universe of information within the knowledge
3 base system has changed over time; but at least this is
4 something that the plaintiffs are specifically asking for.
5 You know, broadly construing relevance, it seems like they've
6 established as much. They're not asking --
7 My understanding, Ms. Luhana, is that you're not asking
8 for every -- a copy of every single policy that lives in the
9 knowledge base system. Right?
10 **MS. LUHANA:** We're not, Your Honor. But the --
11 **THE COURT:** No. You want --
12 **MS. LUHANA:** -- problem --
13 **THE COURT:** -- the overview of it.
14 **MS. LUHANA:** Yes.
15 And the issue is, is we just happen to know about the
16 knowledge base and raise it with them. But the onus is on Uber
17 to have these discussions in discovery where they're providing
18 the non-custodial sources, and that's simply just not
19 happening, where they're forthcoming with what centralized
20 files they have that they don't have to run search terms
21 against.
22 And as I said, like, we want to move forward with
23 discovery here, and that's why some of these milestones were
24 put in place. That's why you put these things in your order,
25 in the ESI order. But it's just -- it's just, unfortunately,

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1 not happening.

2 And we're at a loss here on the non-custodial sources as

3 well as other issues which we're going to speak to Your Honor

4 about later this week.

5 **THE COURT:** Yeah.

6 Mr. Shortnacy, you had referenced other places besides the

7 knowledge base system, that there's other places where policy

8 documents live. And to understand the scope of this -- and

9 there may be some that are not at all relevant. It's just hard

10 for me to fathom. I don't work for Uber. But at what point --

11 if it's three other places where these documents live, then you

12 should disclose that to the plaintiffs. I don't think there's

13 any reason to not be specific about the non-custodial sources

14 of policy documents.

15 **MR. SHORTNACY:** But, Your Honor, I think where --

16 where the stumbling block is in the discussion with plaintiffs

17 as it's being framed is that we're leaping from specific

18 policies to all policies.

19 **THE COURT:** They're not asking for all policies.

20 They're asking for a list of the policies that live in these

21 different systems, whatever the system is that Uber has set up

22 over the course of time.

23 And then from there, they'll figure out, okay, this

24 appears to be relevant, and it's -- the point is, is that we

25 shouldn't -- the gathering of relevant evidence isn't

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1 procedures about driver policies and the way that safety

2 protocols are implemented in the company are not relevant.

3 That's not the argument. The argument is where they reside and

4 how to get them.

5 And I think what we're trying to express to the Court is

6 that we've undertaken an effort to do that and are explaining

7 that to plaintiffs. And it's not fair to say that we're not

8 giving them any information about the non-custodial data

9 sources. Of course we've been engaged in this process, the

10 milestone process, for several weeks. So I take issue with

11 that, Your Honor.

12 **MS. LUHANA:** Judge, Roopal Luhana.

13 We have been engaged in the process and have asked for

14 this on May 6th, May 17th, May 29th, and still have not

15 received.

16 Perhaps it may be helpful for Mr. Shortnacy to provide

17 different policies and things that they're pulling, which are

18 not from non-custodial sources, and then we can have a

19 discussion about those non-custodial sources and what resides

20 there. And perhaps there are other policies which we believe

21 would be relevant, we'd ask them to produce.

22 So, I mean, that requires a discussion and an openness and

23 a willingness to share that information as to these things,

24 so -- as to these non-custodial sources.

25 **MR. SHORTNACY:** And, Your Honor, we certainly are

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1 exclusively and solely based on the search term process.

2 There's just going to be a set of policy documents that are

3 relevant to Uber dealing with drivers in managing whatever

4 safety concerns may come up. So...

5 **MR. SHORTNACY:** But, Your Honor, if I could, what I --

6 what I think the -- the framing -- the framing is going back to

7 policies, because what is being discussed is, like, the overall

8 framework for all policies that exist in the company. And

9 those are in different places. And I frankly, as I sit here

10 today, don't know where all the policies in the company reside,

11 and it may have changed over time.

12 And so that's why we're approaching it from a slightly

13 different approach, which is that we're working internally with

14 the appropriate stakeholders to find the policies that may be

15 relevant.

16 And what I'm hearing is that plaintiffs now -- they don't

17 want and they're not arguing, as I hear, that all policies are

18 relevant. But they're saying that discovery about all of the

19 policies in the company is relevant; whereas I think that

20 that's going to be tremendously burdensome to sort out in a

21 world where we're providing the policies and procedures to the

22 plaintiffs that pertain to the issues in dispute.

23 And so I just feel like we -- we're sort of talking past

24 each other on the way that the plaintiffs are presenting this.

25 We're not -- we're not saying it's not -- the policies and

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1 willing to do that, and I feel like we've been engaged in that

2 process. So we're not sitting here in front of the Court

3 suggesting that we're not willing to provide information.

4 **THE COURT:** Well, it seems like Uber's position is

5 basically that Uber gets to unilaterally decide which policies

6 are relevant without allowing plaintiffs to look at an index or

7 a table of contents of policies and make some determination

8 based on the titles of the policies or how they're organized or

9 situated in categories that the policies might be relevant.

10 And so I just don't think that what plaintiffs are asking

11 for is an unreason- -- is an unreasonable approach to finding

12 relevant policy or other guidance information that Uber has.

13 And the fact that we're here at this point in time and

14 you're not sure where all the different policies may be living

15 when the Court has been expecting that there would be

16 non-custodial sources of policy documents identified, I mean,

17 that order came out months ago. I just expected that it would

18 be further along.

19 But at this point, the one source that we know about is

20 the knowledge base. So provide the index and the list or the

21 table of contents or whatever is necessary for plaintiffs to be

22 able to participate in the identification of relevant policies

23 as opposed to relying on Uber's just unilateral decision-making

24 about what's relevant or having to rely on search terms,

25 because the whole point is this process was to be -- not have

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1 to wait until there's a set of search terms agreed upon.

2 This should have been a more streamlined, faster process.

3 It's not to say that it's a simple process because Uber's been

4 around for a long time; policy -- organizations change over

5 time and have different policies and different approaches to

6 managing their information. So I don't want to oversimplify

7 this. But I think that -- I just don't think that what

8 plaintiffs are asking for is unreasonable.

9 And the sooner that you can do the work with your team to

10 identify the other source and specify that and disclose by the

11 end of the week what those other sources are apart from the

12 knowledge base system, then the sooner there can be a more

13 meaningful meet and confer process.

14 There's no way that I'm in any position to say that it's a

15 disproportionate request to look beyond -- at sources beyond

16 the knowledge base system because there's no specific

17 information that's been shared with the Court or, for that

18 matter, for plaintiffs about the other sources or systems where

19 these policies live.

20 I mean, I expect the plaintiffs to be thoughtful about

21 this. And there's bound to be policies that have nothing to do

22 with -- with the claims here in the case.

23 But it sounds like the meet and confers haven't been very

24 effective at this point.

25 So I'm asking Uber to come up with more specifics around

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1 **THE COURT:** I don't have a preferred --

2 **MR. SHORTNACY:** I'm sorry?

3 **THE COURT:** I don't have a preferred method. So if

4 you all can come to a joint --

5 **MS. GOLDENBERG:** We'll talk.

6 **THE COURT:** -- agreement about how you want to present

7 it, that's fine.

8 **MS. GOLDENBERG:** Sure.

9 **MR. SHORTNACY:** Your Honor, it's Michael Shortnacy

10 speaking.

11 We'll certainly work with plaintiffs on the appropriate

12 format for briefing and how it might be most helpful for

13 the Court.

14 We're certainly willing to engage and continue those

15 discussions with plaintiffs about search terms. So we'll

16 certainly do that, Your Honor.

17 **THE CLERK:** I'm sorry, Your Honor. Your audio seemed

18 to go out again. Apologize.

19 **THE COURT:** Hopefully, I can sort this out before your

20 next appearance. But, hopefully, everyone can hear me at the

21 moment.

22 I don't think that there's anything further that we need

23 to discuss then today.

24 **MS. LUHANA:** There isn't, Judge. Thank you.

25 **THE COURT:** Okay.

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1 these sources so that we can get to the bottom of this sooner

2 rather than later.

3 **MR. SHORTNACY:** We understand that, Your Honor, and

4 certainly, we'll take that guidance to heart.

5 **THE COURT:** Okay. Thank you.

6 So we spent quite a bit of time on the non-custodial

7 sources, and we're not going to hear argument on -- on the

8 other items until the 13th, and then some of the other disputes

9 until the 21st.

10 Is there anything else in the discovery status report that

11 you want to discuss today that would be helpful?

12 **MS. LUHANA:** Your Honor --

13 **MS. GOLDENBERG:** Judge, just in terms of search terms,

14 I wanted to make sure that we submitted that dispute to you in

15 a way that was helpful.

16 The way that we've been doing this is we've been going

17 back and forth on separate sheets with PIT counts and all sorts

18 of things.

19 And different judges like to see this presented in

20 different types of ways, but it doesn't lend itself very well

21 to a two-page letter or I think you're going to end up with a

22 PDF that looks pretty ugly.

23 Do you have a preferred method of dealing with search

24 terms from other cases? If not, we can get one to you and

25 propose it jointly.

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1 **MR. SHORTNACY:** Thank you, Your Honor.

2 **THE COURT:** Okay. Thank you.

3 **THE CLERK:** Court is now adjourned.

4 Thank you, Your Honor.

5 (Proceedings adjourned at 2:51 p.m.)

6 ---o0o---

7

8 **CERTIFICATE OF REPORTER**

9 I certify that the foregoing is a correct transcript


10 from the record of proceedings in the above-entitled matter.

11

12 DATE: Wednesday, June 11, 2024

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17 Ana Dub, RDR, RMR, CRR, CCRR, CRG, CCG

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